



Environmental Management Systems

An environmental management system (EMS) is a tool that facilities can use to reduce their environmental impact and increase operating efficiency as well as compliance. Information on EMS can be found at <http://www.epa.gov/EMS/>.

PARTNERS



Kentucky Division for Air Quality
www.air.ky.gov



Kentucky Pollution Prevention Center
www.kppc.org

REGULATION RESOURCES

Federal Environmental Regulations

<http://www.epa.gov/lawsregs/search/40cfr.html>

Kentucky Environmental Regulations

<http://www.lrc.state.ky.us/kar/TITLE401.HTM>



NEED HELP ?

The Division of Compliance Assistance is available to help ensure compliance with applicable regulations and permit conditions. Our services include:

- Toll-free hotline and e-mail for general information inquiries
- Free multimedia site assessments
- Tailored training programs to meet your organization's needs
- Information on pollution prevention opportunities
- Permitting assistance for application preparation, recordkeeping and reporting and emission calculations
- Technical assistance regarding complying with your permit conditions

Contact us at 800-926-8111 or at envhelp@ky.gov for assistance.

simplifying **Compliance**



PROGRAMS

- Certification and Licensing for Water and Wastewater Operators
- Brownfield Redevelopment Program
- Kentucky's Environmental Leadership Program (KY EXCEL)
- Environmental Compliance Assistance Program

The Division of Compliance Assistance exists to provide services that increase environmental knowledge and change behaviors. We do this to improve regulatory compliance, achieve exceptional performance and enhance the quality of Kentucky's environment and communities.

300 Fair Oaks Ln., Frankfort, KY 40601
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A GUIDE TO AIR PERMIT COMPLIANCE



Air Permit Compliance Guide

UNDERSTANDING WHAT YOUR AIR PERMIT MEANS TO YOU

Oftentimes, violations with air permit conditions are the result of not fully understanding all the components contained within your permit. Incorporating your air permit into your daily operations is essential to compliance. Air permits are living documents not to be hidden away. **Remember that every permit has a lifespan and must be renewed six months prior to expiration.**

ABOUT THIS GUIDE

This guide is designed as a resource to help you understand and communicate your compliance objectives as explained in your air permit. This brochure is not a substitute for reading your permit. Remember that your permit is a legally enforceable document.

Reading, understanding and communicating are essential

FOUR KEY ELEMENTS TO COMPLIANCE

- EMISSION & OPERATIONAL LIMITS
- PERFORMANCE TESTING
- MONITORING
- RECORDKEEPING & REPORTING



Emission and Operational Limits

Emission limits contained within your air permit stem from the applicable regulations that apply to each emission point within your permit. These limits may be emission-point specific or may be a facility-wide emission cap in order to preclude applicability of certain regulations. You may have more than one emission limit per point, and they are usually pollutant-specific. Operational limits, in contrast, are normally restrictions on the way a piece of equipment operates. These limits may be hours of operation, process rates, etc. Knowing your emission and operational limits is an essential first step to compliance.



Regulations incorporated by reference should not be overlooked. They contain essential information regarding the four key elements of any permit. See resource section of brochure.



Performance Testing

Performance testing is a condition that exists to ensure that equipment is operating at a level to meet the emission limits within your permit. Performance testing is often done as a compliance demonstration. Testing conditions in your permit may be for one time only or may occur more frequently. Performance testing must be conducted in accordance with standard test methods and witnessed by Division for Air Quality employees. A compliance test protocol (DEP6028) must be submitted prior to testing. If reliable performance test data is to be used in place of testing for compliance demonstrations, this data shall not exceed five years.



Pollution prevention can reduce or eliminate your air permitting burden. Source reduction or material substitution can mean savings in time and money when talking about compliance.



Monitoring

Monitoring conditions in your permit may include items such as inspections, maintaining logs of maintenance activities, process rates, material usages and hours of operation or may include overseeing operational parameters such as time, temperature, pressure, flow rates, etc. Oftentimes, monitoring conditions can include completing emission calculations. Keep in mind that monitoring conditions involve communicating to employees their role in complying with permit conditions.



Recordkeeping and Reporting

Recordkeeping and reporting is one of the most common areas of noncompliance. Recordkeeping and reporting conditions can be associated with individual emission points or facility-wide. These conditions are often found in the General Conditions section of your permit and are overlooked because they are located toward the end of your permit. Never underestimate the power of documentation as a key element to compliance with your air permit, especially relating to emission calculations and corresponding limits. **The permittee has a legal responsibility to report annually (DEP 7007CC) or more frequently, depending on your permit conditions.**

IMPORTANT PERMIT REMINDERS

- SEMIANNUAL REPORTS
- ANNUAL COMPLIANCE CERTIFICATIONS
- CONSTRUCTION/START-UP NOTIFICATION
- EMERGENCY & MALFUNCTION NOTIFICATION
- SHUTDOWN/START-UP NOTIFICATION

Utilizing an environmental compliance matrix can organize your compliance objectives

A simple matrix can be created using a spreadsheet or word processing program. The matrix can be set up to identify each individual emission point and corresponding applicable regulations, emission limits, testing, monitoring and recordkeeping and reporting conditions. This summary can be a useful reference tool and can help delegate air permit compliance responsibilities.